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Informal Memorandum

Date: December 8, 1994
To: Vern F. Witherill
From: Peter C. Sanford *pcg*
Subject: Meeting to Discuss Building 889 D&D Project RCRA and IAG Interface Issues

- 1.0 Purpose: Identify regulatory issues and requirements involved in the D&D of Building 889.
- 2.0 Discussion:
 - 2.1 The physical configuration of the building is shown in the functional diagram (Attachment 1) which was reconstructed from that sketched during the discussions. The only RCRA unit located in the building is the sumps, which are part of RCRA Unit 40, Process Waste Lines. They were connected by an underground line to tanks T-4 and T-5 in Building 866; this line was disconnected and flanged in both Buildings 889 and 866, and may have been grouted.
 - 2.2 The building sumps had previously been connected to the original process waste lines (OPWL) through some outside unlined concrete tanks, and on to a connection with the OPWL line ("header") to Building 865. This line was disconnected; it was unclear at the meeting whether the line had been removed to outside the building or blanked at the sump. The sumps are considered as part of the OPWL (OU-9).
 - 2.3 There had been two waste handling activities that had been previously considered in the RCRA process. A Baler/Drum Crusher unit had been placed in the Part B permit application, but subsequently removed when it was determined that *it would not be operated*. A Steam Cleaning unit had been placed in the Part A permit as a precautionary filing, and was later removed when it was determined not to be necessary.
 - 2.4 The Building 889 sumps are covered both by the IAG and the RCRA Part B Permit. The group determined that the RCRA unit could be closed under the IAG; that the physical closure process would be described under a Proposed Action Memorandum (PAM), and that any administrative closure actions would be fulfilled by the PAM process.
 - 2.5 A separate "D&D" PAM will be developed to cover the rest of the building cleanup and D&D activity. This PAM will include the equipment removal phase. The impact of inserting a PAM into the project schedule will be determined. It was estimated that the PAM process would take up to three months.
 - 2.6 The question came up as to whether the state will have any authority over the building D&D PAM if it is determined that there is hazardous contamination found within the building.

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IA- IA-A-00086

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- 2.7 It was determined that none of the activities occurring in Building 866 would either be done by or impact the Building 889 D&D activities; however, the process waste line between 889 and 866 might be removed as part of the 889 project.
- 2.8 The question of the extent of the D&D project scope was discussed. Two major items were identified: extent of piping or equipment to be removed and removal of foundations and/or environmental media.
 - 2.8.1 Extent of piping or equipment to be removed - should the scope of the PAM used to close the sumps be extended to include the following items: piping and cement tanks outside the building; piping from those tanks to the "header"; and the piping connecting Building 889 to Building 866.
 - 2.8.2 Removal of foundations and/or environmental media - the following issues were discussed:
 - Under Building Contamination - should soils be sampled through the slab? if so how soon? are soil samples a completion criteria prior to turnover to the IA OU?
 - If soils are to be remediated, define a threshold (concentration? volume?) to avoid expanding the project scope inappropriately.
 - Would the soils work also be covered under the PAM used to close the sumps?

3.0 Action Items

- 3.1 Draft letter to the regulators describing the specific process outlined in item 2.4 above and achieve RFFO concurrence. - Guinn/Sanford
- 3.2 Provide the impact of developing a PAM for the D&D of Building 889 which will include the internal equipment removal. - Klein
- 3.3 Determine if the presence of hazardous contamination will impose any state RCRA authority over the Building 889 "D&D" PAM (as opposed to the inherent authority over the PAM covering the sump removal). - Ticknor/Tome
- 3.4 Review the RCRA Permit to identify other potential issues (also the Historical Release Report). - Guinn
- 3.5 Determine the exact physical scope of the work and how it fits in with an approval strategy. - Sanford
- 3.6 Develop decision points and/or threshold criteria regarding soil and/or foundation removal - Sanford/Tome

cc:

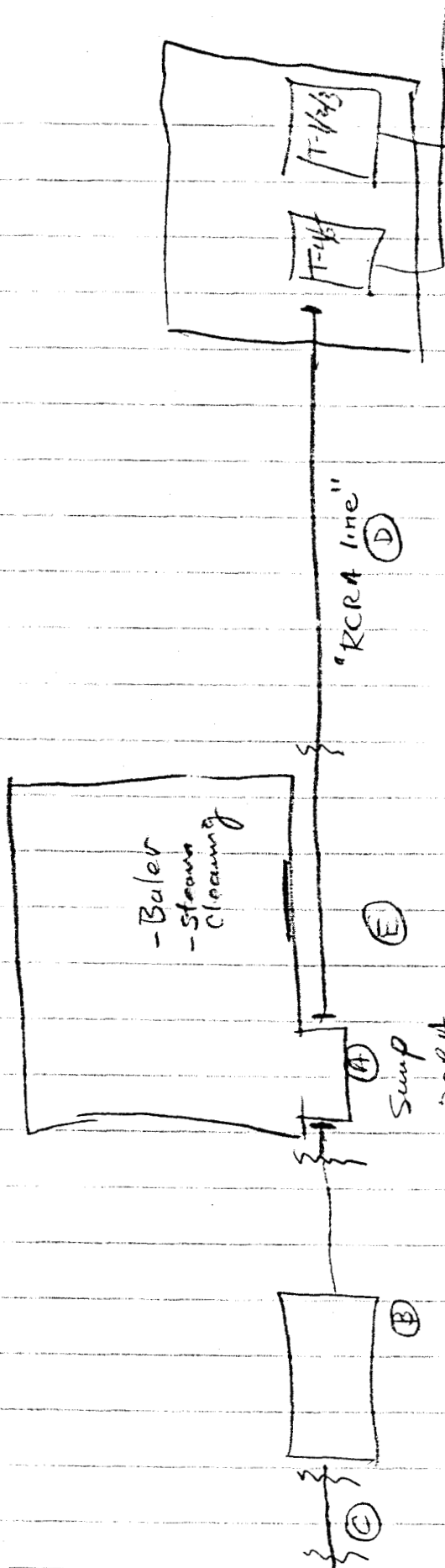
Attendees
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W. Fitch
R. Sarter

T. Bearden
J. Burd
R. Hyland
J. T. Kearns

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DED PAM (#2)
- All Bldg



PAM #1

- Sumps (A) outside tanks (B)
- Line to tank (C)
- Line to heater (D)
- Line to RCRA line (E)
- RCRA line building
- Dirt under building